

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA

Case No. 21-0365-DM

v.

WAYNE D. LOZIER, Jr. and
JODY L. SULLIVAN

**EX PARTE/CONSENT MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL
MOTION**

NOW INTO COURT come defendants WAYNE D. LOZIER, Jr. and JODY L. SULLIVAN , who through undersigned counsel, respectfully moves that this Honorable Court grant an extension of time in which to file pretrial motions in this matter for the following reasons:

1.

At the September 15, 2021 arraignment of the defendants, defendants were given until November 1, 2021, for the filing of pretrial motions.

2.

Counsel for the defendants has been unable to prepare pleadings in the time allotted and requires an additional sixty (60) days to complete pleadings.

3.

Counsel for the government has been contacted and there is no opposition to this motion.

WHEREFORE, for the reasons stated herein, the defendant respectfully requests

that the time for filing special pleadings be extended for an additional sixty days.

Respectfully submitted,

/s Ralph S Whalen, Jr.
Ralph S. Whalen, Jr.
Bar No. 8319
2950 Energy Centre
1100 Poydras Street
New Orleans, Louisiana 70163
(504) 525-1600
Fax (504)525-1606
ralphswhalen@ralphswhalen.com

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2021, I electronically filed the foregoing
With the Clerk of Court by using the CM/ECF system, which will send a notice of electronic
filing to all counsel of record.

s/Ralph S. Whalen, Jr.
Ralph S. Whalen, Jr.